

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

SHANNA GROVE,

Plaintiff,

vs.

Case No. 1:21-cv-00354

Hon. Paul L. Maloney

WZZM a/k/a WZZM-TV a/k/a WZZM13,
TEGNA, INC., and COMBINED
COMMUNICATIONS OF OKLAHOMA, LLC,

Defendants.

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**JOINT MOTION FOR ENTRY OF
STIPULATED PROTECTIVE ORDER**

Plaintiff SHANNA GROVE (“Plaintiff”) and Defendants WZZM a/k/a WZZM-TV a/k/a WZZM13, TEGNA, INC., and COMBINED COMMUNICATIONS OF OKLAHOMA, LLC (“Defendants”), through their respective attorneys, respectfully move this Court to enter an order granting the parties’ stipulation for the protection and exchange of confidential material. In support of their agreed motion, the parties state as follows:

1. The parties have exchanged written discovery requests and anticipate making the production of documents in the near future. In light of the sensitive and confidential nature of some of the information to be exchanged during discovery, including but not limited to employment records of third parties, the parties hereby request that the Court enter a proposed Stipulated Protective Order.

2. A copy of such proposed Stipulated Protective Order is attached hereto as Exhibit A.

Wherefore, Plaintiff and Defendants respectfully request that the Court enter an order granting the parties' stipulation for protection and exchange of confidential material.

Dated: October 4, 2021

Respectfully submitted,

/s/ James C. Baker

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